

Marc J. Randazza, Esq.,
Arizona Bar No. 027861
Randazza Legal Group
10620 S. Highlands Pkwy.
Suite Number 110-454
Las Vegas, NV 89141
888-667-1113
305-437-7662 (fax)
MJR@randazza.com

Attorney for Plaintiff,
LIBERTY MEDIA HOLDINGS, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Liberty Media Holdings, LLC

Plaintiff,

vs.

Vinigay.com; Gustavo Paladeski; Vinicius
Alves

Defendants.

Case No. 11-CV-0280-PHX-LOA

**Affidavit for Award of Attorney's Fees and
Costs of Marc Randazza in Support of
Application for Entry of Default Judgment**

Hearing Date: July 8, 2011

Hearing Time: 2:00 p.m.

Judge: Hon. Lawrence O. Anderson

I, Marc J. Randazza, declare under penalty of perjury that:

1. I am the attorney for Plaintiff Liberty Media Holdings (Liberty).

2. I am an attorney licensed to practice law in Massachusetts, Florida, California,
and Arizona. I have been a practicing attorney for over 10 years, and have extensive experience
in online copyright infringement cases. My billable hourly rate of \$450 is fair and reasonable.

3. In order to save on expenses to my client, I additionally utilize paralegal work.
The paralegal hourly rate of \$150 is fair and reasonable.

4. To date, 17.5 attorney hours and 33.4 paralegal hours have been spent on this
case. This totals \$12,855.00 in fees.

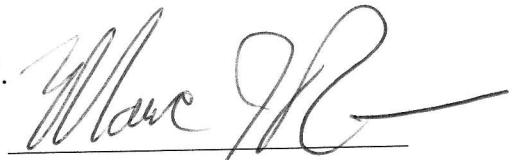
5. As of this writing, I additionally expect to spend an estimated 3 hours of travel
time travelling from my home in Las Vegas, NV to the default judgment hearing in Phoenix, AZ

1 (this includes flight time, as well as travel time to and from airports). I additionally expect to
2 spend 2 additional attorney hours in which includes preparation for and attendance at the
3 hearing.

4 6. Included as Attachment A to this Declaration is a breakdown of time by task as
5 spent litigating this matter.

6 7. Costs in this matter total \$805.40. This includes the \$350.00 filing fee with the
7 Court, and my \$455.50 Southwest Airlines plane ticket to attend the hearing. Copies of receipts
8 for these costs are included herewith as Attachment B.

9
10 Signed on June 23, 2011 in Las Vegas, NV.



11
12 Marc J. Randazza
13 10620 S. Highlands Pkwy.
14 Suite Number 110-454
15 Las Vegas, NV 89141
16 888-667-1113
17 305-437-7662 (fax)
18 MJR@randazza.com
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed using this Court's CM/ECF system on May 31, 2011. Service was made on Defendants by email pursuant to the Court's Order (ECF No. 10).

Dated: May 31, 2011

Respectfully submitted,

s/ Marc Randazza

Marc J. Randazza

10620 S. Highlands Pkwy.

Suite Number 110-454

Las Vegas, NV 89141

888-667-1113

305-437-7662 (fax)

MJR@randazza.com

Time Calculations for
Liberty Media Holdings v. Vinigay.com

| | | | |
|-----------------------|---------------|-----------------|--------------------|
| Attorney Time Total: | 17.5 | at \$450 per hr | \$7,875.00 |
| Paralegal Time Total: | 33.4 | at 150 per hr | \$5,010.00 |
| | Total: | | \$12,885.00 |

Matter Name: Vinigay.com Matter Id: 10326

Matter Created: 2/8/2011 - 12:32 PM
 Matter Age: 133 Days 22 Hrs 46 Mins









Matter Status: **Open**
 Assigned To: Marc J Randazza
 Matter Status: Open

Matter Id: **22.063**
 Client: **1. Corbin Fisher - MJR ONLY**
 Matter Name: Vinigay.com
 Client Contact:
 Acct Manager: Marc J Randazza
 Full Description:





Type: Copyright - Litigation
 Billing Method: Hourly
 Hourly Rate: Default Rates
 Overtime: Default Rates
 Payment Due Upon: Bill regularly
 Created By: Eric Gapp

Work History

Total Billable Hours: 50.90
 Total Attorney Time Hours: 50.90

| <u>Type</u> | <u>User</u> | <u>Description</u> | <u>Date</u> |
|--|---------------|--|---------------------|
| Work Entry  | Eric Gapp | Drafting proposed findings of fact/contentions of law <i>Travel Time: 0.00 Attorney Time Time: 1.50 Billable Time: 1.50</i> | 06/21/2011 5:33 PM |
| Work Entry  | Eric Gapp | Review Order; Review case file; Research and prepare proposed findings of fact and contentions of law <i>Travel Time: 0.00 Attorney Time Time: 1.00 Billable Time: 1.00</i> | 06/17/2011 4:09 PM |
| Work Entry  | Eric Gapp | Update case file with new filings; Prepare courtesy copy for judge; Email exchange with Jason Tucker <i>Travel Time: 0.00 Attorney Time Time: 1.00 Billable Time: 1.00</i> | 06/01/2011 4:34 PM |
| Work Entry  | Eric Gapp | Review revisions to App for Default Judgment from Fishcer and email to MJR re: same; Update EG declaration; Draft declaration for Henry Leonard <i>Travel Time: 0.00 Attorney Time Time: 3.60 Billable Time: 3.60</i> | 05/31/2011 2:27 PM |
| Work Entry  | Marc Randazza | Drafting final edits to application for default judgment. IOC with EWG <i>Travel Time: 0.00 Attorney Time Time: 2.00 Billable Time: 2.00</i> | 05/31/2011 11:47 AM |
| Work Entry | Marc Randazza | Review of file to prepare damages memorandum. Exchange emails with EWG. Work on declaration of Henry Leonard regarding proving damages. <i>Travel Time: 0.00 Attorney Time Time: 1.80 Billable Time: 1.80</i> | 05/31/2011 12:00 AM |
| Work Entry  | Eric Gapp | Prepare declaration and exhibits for app for default judgment; Email to JAF re review of memo <i>Travel Time: 0.00 Attorney Time Time: 1.20 Billable Time: 1.20</i> | 05/26/2011 12:34 PM |
| Work Entry | Marc Randazza | Phone call with Jessica Pena at Pink Visual re potential assistance as amicus curae at Vinigay hearing <i>Travel Time: 0.00 Attorney Time Time: 0.50 Billable Time: 0.50</i> | 05/26/2011 12:00 AM |
| Work Entry | Marc Randazza | Phone call with JAF re hearing and proveup <i>Travel Time: 0.00 Attorney Time Time: 0.40 Billable Time: 0.40</i> | 05/26/2011 12:00 AM |
| Work Entry  | Eric Gapp | Continue drafting memo supporting application for default judgment <i>Travel Time: 0.00 Attorney Time Time: 2.40 Billable Time: 2.40</i> | 05/25/2011 11:52 AM |
| Work Entry  | Eric Gapp | Review court order re: app for default judgment; Online research re: issues presented; Prepare app for default judgment and supporting memorandum <i>Travel Time: 0.00 Attorney Time Time: 5.70 Billable Time: 5.70</i> | 05/24/2011 12:35 PM |

05/24/2011 10:27 AM

| | | | |
|---|---------------|---|---------------------|
| Work Entry | Eric Gapp | Discuss damages calculations with Henry; Review evidence file | |
|  | | <i>Travel Time: 0.00 Attorney Time Time: 0.30 Billable Time: 0.30</i> | |
| Work Entry | Eric Gapp | Review order from court re: default judgment/damages hearing and discuss with MJR | 05/23/2011 5:48 PM |
|  | | <i>Travel Time: 0.00 Attorney Time Time: 0.50 Billable Time: 0.50</i> | |
| Work Entry | Marc Randazza | Receipt and review of court order and establishment of game plan for hearing. MEeting with Mat regarding costs of production of films. Outlining briefing. Research concerning cost per minute, actual damages, and statutory damages' interplay. | 05/23/2011 12:00 AM |
| | | <i>Travel Time: 0.00 Attorney Time Time: 1.60 Billable Time: 1.60</i> | |
| Work Entry | Eric Gapp | Update docket mirror image with recent filings | 04/13/2011 8:33 AM |
|  | | <i>Travel Time: 0.00 Attorney Time Time: 0.20 Billable Time: 0.20</i> | |
| Work Entry | Marc Randazza | Drafting default package. | 04/12/2011 8:42 PM |
|  | | <i>Travel Time: 0.00 Attorney Time Time: 1.00 Billable Time: 1.00</i> | |
| Work Entry | Eric Gapp | Revise, file and serve Motion for Default and Response to OSC | 04/12/2011 6:23 PM |
|  | | <i>Travel Time: 0.00 Attorney Time Time: 0.30 Billable Time: 0.30</i> | |
| Work Entry | Eric Gapp | Update docket mirror with recent filings; Prepare Motion for Default; Prepare Response to OSC | 04/11/2011 5:55 PM |
|  | | <i>Travel Time: 0.00 Attorney Time Time: 0.90 Billable Time: 0.90</i> | |
| Work Entry | Marc Randazza | review of file for default. | 04/11/2011 11:43 AM |
|  | | <i>Travel Time: 0.00 Attorney Time Time: 0.20 Billable Time: 0.20</i> | |
| Work Entry | Eric Gapp | File executed summons | 03/10/2011 12:48 PM |
|  | | <i>Travel Time: 0.00 Attorney Time Time: 0.20 Billable Time: 0.20</i> | |
| Work Entry | Marc Randazza | Review of complaint filed. Review of collection procedures for AZ. | 03/10/2011 12:00 AM |
| | | <i>Travel Time: 0.00 Attorney Time Time: 0.50 Billable Time: 0.50</i> | |
| Work Entry | Eric Gapp | Update case file with summons; Email serve defendants | 03/09/2011 11:34 AM |
|  | | <i>Travel Time: 0.00 Attorney Time Time: 0.40 Billable Time: 0.40</i> | |
| Work Entry | Marc Randazza | Review of file and summonses issued. Review of emails from court. | 03/09/2011 12:00 AM |
| | | <i>Travel Time: 0.00 Attorney Time Time: 0.30 Billable Time: 0.30</i> | |
| Work Entry | Eric Gapp | Prepare and submit summons for issuance | 03/08/2011 1:35 PM |
|  | | <i>Travel Time: 0.00 Attorney Time Time: 0.40 Billable Time: 0.40</i> | |
| Work Entry | Marc Randazza | Review of court filings. | 03/08/2011 12:00 AM |
| | | <i>Travel Time: 0.00 Attorney Time Time: 0.30 Billable Time: 0.30</i> | |

From: azddb_responses@azd.uscourts.gov
Subject: Activity in Case 2:11-cv-00280-LOA Liberty Media Holdings LLC v. Vinigay.com et al Complaint
Date: February 11, 2011 8:35:02 AM PST
To: azddb_nefs@azd.uscourts.gov

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court
DISTRICT OF ARIZONA

Notice of Electronic Filing

The following transaction was entered on 2/11/2011 at 9:35 AM MST and filed on 2/10/2011

Case Name: Liberty Media Holdings LLC v. Vinigay.com et al

Case Number: 2:11-cv-00280-LOA

Filer: Liberty Media Holdings LLC

Document Number: 1

Judge(s) Assigned: Lawrence O Anderson (presiding)

Docket Text:

COMPLAINT. Filing fee received: \$350.00, receipt number PHX 0970-4888097, filed by Liberty Media Holdings LLC (submitted by Marc Randazza). (Attachments: # (1) Exhibit, # (2) Exhibit, # (3) Exhibit, # (4) Exhibit, # (5) Exhibit, # (6) Exhibit, # (7) Exhibit, # (8) Civil Cover Sheet)(REK)

2:11-cv-00280-LOA Notice has been electronically mailed to:

Marc John Randazza marc@libertymediaholdings.com, eric@libertymediaholdings.com, MJR@randazza.com

2:11-cv-00280-LOA Notice will be sent by other means to those listed below if they are affected by this filing:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1096393563 [Date=2/11/2011] [FileNumber=6615949-0]
] [68a7135c4205bbb5e064309d796bc84f9eaddb895f2f26d3361abf7491e8deb9349
35933480880f9d7901abfbd16ca55cea25ab4eb5ed62da2f4684689a07a79]]

Document description:Exhibit

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1096393563 [Date=2/11/2011] [FileNumber=6615949-1]
] [a8ff3184abc1f9bfdd32e929b2cdb5bf8dac92ef96bf0026c10d4249b3f5581b8
b7dde392632e422971e37afbf7bea849e579ebb9be384b2e1c38b77ff184f]]

Document description:Exhibit

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1096393563 [Date=2/11/2011] [FileNumber=6615949-2]
] [89be843c98b8192036f22a5117dc7c0b76706abf4bb5f1ef32acaae0de539749cac
ab9ef6188d9a933ed90be0e5ba1f5d48e8b91c7d00efdf924caa75f911e75]]

Document description:Exhibit

Original filename:n/a

Electronic document Stamp:



Thank you for your purchase!

Las Vegas, NV - LAS to Phoenix, AZ - PHX

New Purchases in Trip

Air

Confirmation: WINRCY

Las Vegas, NV - LAS to Phoenix, AZ - PHX
Friday, July 8, 2011

Air Total: \$455.40

Amount Paid
\$455.40

Trip Total
\$455.40

8 07/08/11 - Phoenix

New purchases added to your trip.

AIR

Las Vegas, NV - LAS to Phoenix, AZ - PHX
07/08/2011

Confirmation # WINRCY

Adult Passenger(s)
MARC RANDAZZA

Rapid Rewards #
00000128010105

| | | | |
|---------------|--|---------------|-----------------------------|
| DEPART | 10:25 AM Las Vegas, NV (LAS) to | Flight | Friday, July 8, 2011 |
| | 11:30 AM Phoenix, AZ (PHX) | #3500 | Travel Time 1 h 05 m |
| | | | (Nonstop) |

| | | | |
|---------------|-------------------------------------|---------------|-----------------------------|
| RETURN | 6:10 PM Phoenix, AZ (PHX) to | Flight | Friday, July 8, 2011 |
| | 7:15 PM Las Vegas, NV (LAS) | #1835 | Travel Time 1 h 05 m |
| | | | (Nonstop) |

| Passenger Type | Trip | Routing | Fare Type | Base Fare | Govt. Taxes and Fees | Quantity | Total |
|---|--------|---------|-----------------|-----------------|----------------------|----------|-----------------|
| Adult | Depart | LAS-PHX | Business Select | \$201.86 | \$25.84 | 1 | \$227.70 |
| Adult | Return | PHX-LAS | Business Select | \$201.86 | \$25.84 | 1 | \$227.70 |
| Please read the fare rules associated with this purchase. | | | | \$403.72 | \$51.68 | 1 | \$455.40 |

Rapid Rewards points will be deposited into the Member's account once the entire ticket has been flown, exchanged, or refunded (if applicable).

Air Total:
\$455.40

Purchaser Name Marc Randazza

Billing Address 3969 4Th Ave Ste 204
San Diego, CA 92103

Form of Payment

Amount Applied

\$455.40

Visa - XXXXXXXXXXXX-1117